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DOCKET FILE COPY ORIGINAL

February 1, 2006

RECEIVED

FEB - 1 2006

Federal Communications Commission  
Washington, D.C. 20554

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

Re: CC Docket 94-102  
E911 Handset Penetration Quarterly Report  
Cellular South Licenses, Inc.

Dear Ms. Dortch:

On behalf of Cellular South Licenses, Inc. ("Cellular South"), there is submitted herewith a report of the status of the carrier's progress in achieving 95% systemwide handset of location-capable handsets.

Cellular South is a Tier III digital wireless carrier operating cellular radiotelephone and personal communications services mainly in Mississippi, Tennessee, Alabama and the Florida panhandle, as well as in Arkansas and Louisiana. This report is submitted in compliance with the terms of the *Order*, CC Docket No. 94-102, FCC 05-215, released December 29, 2005, conditionally granting Cellular South an extension through March 29, 2007, of the deadline for compliance with Section 20.18(g)(1)(v) of FCC rules, 47 C.F.R. § 20.18(g)(1)(v).

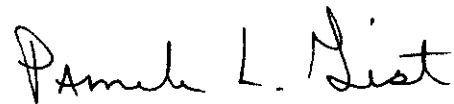
Pursuant to Sections 0.457(d) and 0.459 of FCC Rules, it is hereby requested that the information reported herein be treated by the Commission as confidential, and be withheld from public inspection. The information, which would not customarily be released to the public, is confidential commercial information, and should be protected in accordance with Sections 0.457(d) and 0.459 of FCC Rules.

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Federal Communications Commission  
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Should any questions arise with respect to this matter, please feel free to communicate directly with the undersigned.

Very truly yours,

A handwritten signature in black ink that reads "Pamela L. Gist". The signature is written in a cursive style with a large, stylized "P" and "G".

Pamela L. Gist

# **CELLULAR SOUTH LICENSES, INC.**

## **E911 REPORT**

**FEBRUARY 1, 2006**

The following information is submitted in accordance with FCC directive:

### **1. The number and status of Phase II requests from Public Safety Answering Points**

Within the wireless service area of Cellular South Licenses, Inc. ("Cellular South"), there are a total of 194 PSAPs. Of those, fifty-eight have requested Phase II services. Fifty-five of those PSAPs have become capable of receiving and utilizing Phase II data. Cellular South is delivering Phase II data, and it is being processed by those fifty-five PSAPs. Two PSAPs in Newton County, Mississippi requested Phase II service on August 17, 2005. A PSAP in Lincoln County, Mississippi requested Phase II service on November 10, 2005.

### **2. The dates on which Phase II service will be available to PSAPs served by Cellular South's wireless network**

Cellular South plans to start delivering Phase II data to the Newton County PSAPs by mid-February 2006. Cellular South plans to start delivering Phase II data to the Lincoln County PSAP by May 2006. Cellular South stands ready to timely honor future requests for Phase II services as they are received from PSAPs and as the PSAPs become capable of receiving and processing Phase II data.

### **3. The status of coordination efforts with PSAPs for alternative 95% handset penetration dates**

Cellular South is actively working with the PSAPs to keep them informed of the carrier's progress in achieving higher location-capable handset penetration rates. Since the Commission extended the date by which Cellular South must achieve 95% penetration, Cellular South has formulated a plan to communicate with each PSAP, and has sent letters updating them on the status of Cellular South's Phase II penetration goal. Janie Shelton, Director of Network Services for Cellular South, contacts each PSAP regularly to report the current penetration figure. The response of each PSAP has been positive. No PSAP has expressed objection to the projected schedule.

### **4. Efforts to encourage customers to upgrade to location-capable handsets**

Cellular South has adopted a plan to notify customers as to which PSAPs located within Cellular South's service area are capable of receiving and processing the Phase II E911 data that is being delivered to them by Cellular South, when other PSAPs are expected to be capable, and when still others are expected to begin the Phase II process by submitting requests for data. By means of billing inserts and bill messages, customers will be informed that by upgrading their handsets they will have the ability to automatically transmit their location information to emergency officials when they call 911.

At the same time, Cellular South has extended its advertising campaign to encourage customers to adopt upgraded handsets. The ads target TDMA and

analog customers with special offers on the trade-in of their old handsets for location capable handsets. Promotional offerings include a free phone for switching to the CDMA system. Promotions for phones with cameras, ringtones, color screens and other features are also used to lure customers into upgrading their handsets. Furthermore, the campaigns advertise the safety and coverage advantages of the CDMA system. The special offers are disseminated by direct mail, text messaging and radio/tv ads. Samples of Cellular South's advertisements and text messages are included herewith.

**5. The percentage of customers with location-capable phones**

As of January 30, 2006, approximately 91% of Cellular South's subscribers were using Phase II location-capable handsets.

**6. Status in achieving compliance and whether Cellular South is on schedule to meet its revised 3/29/07 deadline**

Cellular South maintains its policy of selling and activating only location-capable digital handsets. It continues to promote its CDMA network facilities and to conduct marketing campaigns to encourage consumer adoption of new handsets. The penetration rate of location capable handsets is increasing, and Cellular South expects to be compliant no later than March 29, 2007.



**GET YOUR NEW CDMA PHONE  
THE NEXT DAY  
YOU ONLY HAVE TO GO AS FAR AS YOUR MAILBOX**

# FREE PHONE

SWITCH TO OUR CDMA NETWORK AND CHOOSE BETWEEN A  
FREE NOKIA 6015\* OR FREE KYOCERA MILAN KX9C\*

## NOKIA 6015 FEATURES

Color Display  
Voice Dialing  
BREW™ Capable  
E-911 Capable  
CODE: CPN1151TA



OR



## KYOCERA MILAN FEATURES

Dual Displays  
Built-In Ringtones  
BREW™ Capable  
E-911 Capable  
CODE: CPN1151TB

Call 1.877.9CSOUTH to receive your FREE phone. FREE next business day delivery when you call by 3:30 p.m.

## WHY SHOULD YOU SWITCH?

As a newer technology, our CDMA network offers a higher quality of service than our older networks. We are continuously increasing the size of our CDMA network, which means you can use your phone in more places. With one phone call, you can have a similar or even better calling plan, a bigger wireless network and a cool new phone.

## WE MAKE SWITCHING TO CDMA EASY!

To take advantage of the benefits of CDMA, all you have to do is call

**1.877.9CSOUTH.**

Offer available only through Telesales.



the network you can count on

\*Free Nokia 6015 or FREE Kyocera Milan KX9C requires new activation or additional line on existing CellularSouth account. Two-year contract and purchase of calling plan required. Not valid for upgrades. Certain restrictions, taxes and fees may apply. Offer good only through Telesales at 1.877.9CSOUTH. Must mention code CPN1151TA for the Nokia 6015 or CPN1151TB for the Kyocera Milan KX9C. Offer ends 11/31/2005. Use of this offer constitutes your acceptance of these terms and other terms that may be imposed on the line for use on our CDMA network. CellularSouth, Inc. Not valid with any other offer. The Nationwide Plus calling plan applies to usage on the CellularSouth CDMA tower Network, which includes Memphis and Mississippi, then Georgia, Alabama to Boston, Florida. Nationwide Coverage includes the entire United States, Puerto Rico and the U.S. Virgin Islands. For more information call Telesales at 1.877.9CSOUTH. ©2005 CellularSouth, Inc. All Rights Reserved.

# WHAT'S IN IT FOR YOU?

## A BETTER PLAN, BETTER NETWORK AND A FREE PHONE WHEN YOU SWITCH TO CDMA.

### BETTER PLAN

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Nationwide Plus **\$59<sup>99</sup>**  
/MONTH

- + Unlimited calling from home to anyone in the U.S.
- + 750 away minutes
- + FREE Voicemail, Call Waiting, Call Forwarding and Conference Calling

Or one of our helpful representatives will recommend  
a CDMA plan that meets your specific needs.

### BETTER NETWORK

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OUR CDMA NETWORK KEEPS GETTING BIGGER AND BETTER

- + 154 new CDMA cell sites in 2005, a \$25 million investment
- + 225 new CDMA cell sites coming in 2006, a \$51 million investment
- + We've partnered with carriers nationwide to provide you with the best-of-the-best networks when you travel.
- + With CDMA you'll enjoy a higher quality network than what you have now. That means better coverage in more places.



Text messages sent by Cellular South to all of its TDMA customers:

Get a free phone, new plan & bigger network. Switching is free & easy. Call Cellular South at 1.877.9CSOUTH. Free next-day shipping when you call by 3:30.

Old Phone? Old network? Call today for a free phone & new, larger network. Switching is easy. Call 1.877.9CSOUTH. Free next-day shipping when you call by 3:30.